

AFFIDAVIT of:
Detective Constable Christopher PURCHAS #7446

I, Chris PURCHAS, a member of the Toronto Police Service and a Peace Officer,
MAKE OATH AND SAY AS FOLLOWS:

I, Chris PURCHAS, am a police officer with the Toronto Police Service. I have been so employed since August 1996.

In June of 2011, I was seconded to the Royal Canadian Mounted Police to assist nationally in developing capacity across the country by securing the most advanced and current investigative technology solutions and training Canadian officers in its use.

I am currently the Internet Child Exploitation Subject Matter Expert for Eastern Canada. As part of my daily duties, I coordinate regional and national projects where I conduct investigations using the CPS software suite to identify and investigate individuals who are trading child exploitation material on the Internet.

I have been involved in child pornography investigations and Internet sexual related offences since May, 2004. I have received training in the investigation of child pornography trading on Peer to Peer networks and have been involved in Peer to Peer investigations since June of 2005. In June of 2006 I became qualified to instruct on Peer to Peer investigations and have since lectured on Peer to Peer investigations across Canada and Internationally in countries such as The United States, Australia, Brazil, Costa Rica, the United Arab Emirates, and the Netherlands. I have trained over 300 Police Officers nationally and internationally in Peer to Peer Investigations. I have been involved in over 200 cases and have given expert testimony on 16 occasions at both the provincial and the superior court levels.

The technology utilized by the CPS suite of tools is revolutionary and provides investigators with valuable information which enables them to identify, prioritize and bring to justice the most prolific offenders. Since adopting this technology in Canada, over 50 children have been rescued from abuse as a direct result of the deployment of this technology across the country.

The disclosure of this investigative technique would have a tremendously negative impact on Canadian investigations. Offenders would be able to study the technique and devise counter-measures for effectively avoiding detection. This would undoubtedly put hundreds of ongoing investigations at risk and most notably, children who are in abusive situations that may have been rescued will now continue to suffer in silence.

A substantial amount of resources have been invested in developing technology to identify areas of the Internet where offenders trade child exploitation material. If this information is disclosed, the offenders will simply move elsewhere to avoid detection. Once again, the net result is officers possibly missing the opportunity to rescue a child from an abusive situation.

We are currently in the middle of a regional project in Eastern Canada where the CPS suite of tools were used extensively. There have been 3 search warrants executed and approximately 30 pending. Of the three warrants already executed, one victim was identified and rescued. The CPS suite is a valuable investigative tool in Canada. If this investigative technique is compromised, the results will be devastating.

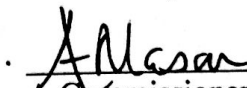


Signature

Sworn by the said Detective Constable Christopher PURCHAS #7446

Before me, ANGELINA MASON

At The City of Toronto on the 3rd day of JUNE, 2013.



A Commissioner of Oaths for the Province of Ontario.

ANGELINA MASON, a
Commissioner, etc., City of Toronto,
for the Toronto Police Service.
Expires June 1, 2016.